40 years and moving forward

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

May 28, 2013

RE: MAHONING COUNTY
FALCON FOUNDRY
NPDES PERMIT NO. 3IN00362
MAY 2013 CEI

Mr. Gary Slaven, President
Falcon Foundry
Sixth and Water Streets
Lowellville, OH 44436

Mr. Slaven:

On May 9, 2013, this writer conducted an inspection of the Falcon Foundry located at 96 Sixth Street in Lowellville. The intent of the inspection was to evaluate storm water control systems and to discuss modifications of the Storm Water Pollution Prevention Plan (SWP3). The compliance record was also reviewed as part of this NPDES Permit.

Storm Water BMPs

Storm water from the facility discharges to a small, unnamed tributary of the Mahoning River. The tributary is located on the east side of the property between the manufacturing facility and the sand storage area. Storm water runoff originates from roof drains, drainage from the area surrounding the manufacturing area and possibly from the sand storage area.

Several Best Management Practices (BMPs) had been implemented prior to the inspection to control the runoff of sediment and contaminants from the property. Following is a list of BMPs identified during the inspection.

1. A catch basin was installed on the northeast corner of the building to isolate the area from sand and contaminants. The catch basin receives a pipe from the north side of the building and delivers storm water to the unnamed tributary via a 12" pipe. The new catch basin replaced an open pit that was previously surrounded by sand and other debris. The sand and contaminants discharged into the unnamed tributary during precipitation events via the old pit.

2. Sand and other debris have been removed from the east side of the manufacturing site to reduce the amount of contaminant runoff to the unnamed tributary. Though there remains sand residue on the pavement, the amount of sand and debris has been significantly reduced on the drive area and adjacent areas. Plans for a storage pit to store spent sand were discussed. The intent is to reduce the amount of sand transported across the east driveway.

3. A diversion ditch has been constructed to divert storm water runoff from the large sand pile to an infiltration area. The diversion ditch is located on the west side of the sand pile and directs storm water runoff to a pit where it infiltrates back into the sand pile.

4. Water used to quench hot metal was previously discharged to the storm sewer system. When this was discovered, Falcon started using the quench water to quench hot dross material.

In addition to the BMPs in place during the inspection, the following BMPs are being considered.

A. The heat exchanger on the north side of the facility currently discharges blowdown to Outfall 003 of the NPDES Permit. It is understood that Falcon plans to redirect the blowdown water to the sanitary sewer system. Ohio EPA highly recommends that this BMP be implemented as soon as possible, but no later than 30 days from the date of this letter.

B. A bag house is operated on the west side of the facility. A trench drain collects storm water that drains from the drive area surrounding the bag house. Plans were discussed to collect samples of the storm water to determine if contaminants from the bag house area are discharging to the trench drain. This writer recommends that samples of storm water be collected as soon as possible. In the event contaminants are identified in the storm water, it is understood that a plan will be developed to address the source(s) of contaminants.

C. Plans were proposed to install new downspouts and storm sewers on the north and south side of the facility. It was understood that the intent is to access the storm sewers with only downspouts from the building. Follow up samples of the storm water runoff through the two new storm sewers will be analyzed to determine if contaminant runoff from the roof area is occurring. A scope of work for the north side storm sewer was received on May 17, 2013. A Scope of Work for the south side storm sewer is expected at this office on May 31, 2013.

D. A proposal was made to isolate the railroad tracks and the access road on the north side of the facility from the drive area on the east side of the building. It was proposed catch basins would be constructed at the drive area to intercept storm water runoff from the railroad tracks and access road, and redirect the runoff to an existing catch basin. It is understood that this project is currently being designed, and when the design is completed, the project will be installed.

E. The east side of the facility contains numerous down spouts to transport roof runoff to the unnamed tributary. In addition, the drive area drains to the unnamed tributary. The east area is complex because of the multiple sources of potential contaminants from the area. As a result, multiple BMPs may be implemented for the east side area. Once efforts are completed on the north and south sides of the facility, a final decision will be made regarding the east side of the property. I final date for submitting a Scope of Work for the east side of the property is January 6, 2013.

F. Additional work will be done to identify the location and ultimate point of discharge for drainage pipes inside the building. This effort will identify possible sources of wastewater and the proper method of disposal. A Scope of Work or this BMP effort is to be submitted to this office no later than June 14, 2013.

G. It was proposed that the Didion Crusher be relocated to the large sand pile area to eliminate a contaminant source to the drive area on the east side of the facility. This writer agrees that the Didion Crusher could be a source of storm water contaminants if operated at its current location. It is recommended that this BMP be further considered.

H. The pneumatic transporter pit is currently positioned just south of the Didion Crusher. It was discussed that the pit be relocated as a junction box for all of the storm sewers on the east side of the building. Use of the box will provide a convenient location for large particulate material to settle out of the storm water prior to entering a proposed retention basin. This may reduce the frequency of cleaning the retention basin and provide a convenient location to excavate the heavy particulate material.

I. This writer recommended that the access road to the large sand pile be dressed with large gravel. This will help to minimize the amount of sand dragged onto the drive area when disposing of sand to the pile. In addition, the access road to the sand pile should be routinely redressed with clean gravel. This is a standard BMP employed at construction sites to minimize the amount of soil dragged onto roads by construction vehicles.

During the inspection, dried paint was identified on the north side of the facility. The source of the dried paint was identified as the Rollover Machine. Falcon must immediately eliminate the discharge of paint. The paint is a source of storm water contamination during runoff events.

SWP3:

During the meeting, we agreed that the Storm Water Pollution Prevention Plan (SWP3) would be revised by the first week in September. However, that revised SWP3 was never submitted to this office. The revisions are necessary to incorporate all of the current and planned structural and nonstructural BMPs. Also, Part IV of the NPDES requires the SWP3 to be kept current, and that Falcon properly implement the SWP3. Failure to keep the SWP3 current and properly implement the plan is a violation of the NPDES Permit. The revised SWP3 must be submitted to this office no later than June 28, 2013.

Compliance Review:

A review of the eDMR data was reviewed as part of this inspection. The review showed that no eDMR data has been submitted since August 2012. Falcon Foundry must immediately begin to collect and analyze stormwater samples 1/month in accordance with the NPDES Permit. The results must also be submitted to Ohio EPA in accordance with the NPDES Permit.

You may contact this writer at (330) 963-1251 or at john.kwolek@epa.ohio.gov to discuss any questions you may have.

Respectfully,

John Kwolek
District Engineer
Division of Surface Water

JK:bo

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